

REMARKS

1. In response to the Final Office Action mailed April 7, 2004, Applicants respectfully request reconsideration. Claims 21-46 were last presented for examination. In the outstanding Office Action, claims 21, 29 and 38 were rejected. Claims 31-37 and 42-46 were allowed and claims 22-28, 30 and 39-41 were objected to. No claims have been amended, cancelled or added in this paper. Thus, upon entry of this paper, claims 21-46 will remain pending in this application. Of these 26 claims, four claims (claim 21, 31, 38 and 42) are independent. Based on the following Remarks only, Applicants respectfully request that the outstanding objections and rejections be reconsidered, and that they be withdrawn.

2. Independent claims 21 and 38, and dependent claim 29 have been rejected under 35 U.S.C. §102(e) as being anticipate by U.S. Patent No. 6,047,123 to Brown *et al.* (hereinafter, "Brown"). Applicants respectfully disagree.

3. For at least the reasons noted below, Brown's interceptor 34 is not "configured to attach the graphics diagnostic tool to at least one selected portion of the computer graphics system during normal operations of a currently-executing graphics application" as recited in Applicants' claim 21 or "while a graphics application is executing on the graphics system" as recited in Applicants' claim 38. Nor does Brown disclose, teach or suggest doing so and "without interruption to the normal operations of an executing graphics application" as recited in Applicants' claims 21 and 38.


4. In contrast to Applicants' claimed invention, Brown's interceptor 34 is a collection of shell procedures (such as dynamically linked libraries (DLL's)) having names/parameters identical to those of the traced calls to be captured." (*See*, Brown, col. 4, lns. 41-46; Figure 2.) Referring to Brown's Figure 3, Brown describes that "to effect this linking the operator can command host processor 12 to redirect calls from graphics library 32 to the file or directory containing the shell procedures. Once execution of the applications program is then initiated (step 52), it generates calls to be traced (step 54) which are intercepted by the shell procedures (step 56)" (*See*, Brown, col. 4, lns. 47-53; Figure 3; emphasis added.) Because operator action is required to link intercept library 34

and because such operations occur prior to execution of Browns' graphics application 30, Brown neither discloses, teaches nor suggests that interceptor 34 is attached (i.e., linked) to Brown's graphics library 32 during, and without interruption to, normal operations of Brown's graphics application 30. The drawbacks associated with linking conventional intercept libraries, such as Brown's interceptor 34, to a graphics system are addressed in detail in the Background of the Invention section of Applicants' application. (*See*, Applicants' application par. 10-12). For at least the above reasons, Applicants respectfully assert that Brown neither discloses, teaches nor suggests Applicants' invention as recited in independent claims 21 and 38. Accordingly, Applicants respectfully request that the rejection of these claims be reconsidered and withdrawn.

5. The dependent claims are patentable for at least the same reasons as those noted above in connection with their respective base claims.

6. In view of the foregoing, this application should be in condition for allowance. A notice to this effect is respectfully requested.

Respectfully submitted,



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